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June 9, 2022

BY ECF:

Hon. Katherine Polk Failla
District Court Judge
United States District Court
Southern District of New York
40 Foley Square, Courtroom 618
New York, NY 10007

MEMO ENDORSED

RE: United States v. Olanrewayu Ajibola
Case No.: 1:21-cr-00472-6 (KPF)
Third Request for a Modification of Release Conditions

Dear Judge Failla:

Please be advised that Spodek Law Group P.C. represents **Olanrewayu Ajibola**, the Defendant in the above-referenced matter. Mr. Ajibola respectfully requests the removal of the conditions of curfew and location monitoring, as well as a modification to allow him to travel to the Eastern District of Pennsylvania for employment purposes.

On June 2, 2021, Mr. Ajibola was released from detention on the following conditions:

- \$75,000 Personal Recognizance Bond;
- 2 Financially Responsible Persons;
- Travel Limited to SDNY/EDNY & District of New Jersey;
- Surrender Travel Documents (& No New Applications);
- Pretrial Supervision As Directed by Pretrial Services;
- Home Detention;
- Location Monitoring; and
- Defendant to Continue or Seek Employment.

(ECF No.: 15).

Hon. Katherine Polk Failla, *District Court Judge*

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On August 2, 2021, Judge Jesse M. Furman modified Mr. Ajibola's release conditions to permit him to reside with his spouse rather than his mother-in-law, with no other change in release conditions. (ECF No.: 31). Further, on December 7, 2021, Your Honor modified Mr. Ajibola's release conditions from Home Detention to Curfew, with no other change in release conditions. (ECF No.: 56).

On May 31, 2022, Mr. Ajibola was offered and accepted employment with CSI Healthcare IT. Mr. Ajibola was initially scheduled training from June 2nd to June 9th in Philadelphia, PA. Mr. Ajibola has been rescheduled to attend training from June 13th to June 17th in Philadelphia, PA. The project he is assigned to is with RWJBarnabas Health. Mr. Ajibola will be staying at the Hampton Inn in Harrison, NJ for the duration of his training. Mr. Ajibola has been provided a rental car to travel between the hotel and the training facility in Philadelphia. Pretrial Services is in receipt of the corroborating documentation, including but not limited to Mr. Ajibola's employment contract. Upon conclusion of his training, Mr. Ajibola will be assigned at a specific site for a set period of time¹. Mr. Ajibola's training will not interfere with his ability to attend the in-person change of plea hearing scheduled for June 14, 2022 at 2:00 PM.

Neither the Government nor Pretrial Services object to Mr. Ajibola's request. Thank you for your consideration.

Sincerely,
Spodek Law Group P.C.
/S/ Todd A. Spodek

TAS/az

cc: All Counsel (By ECF).

¹ There will be future assignments to different sites. Upon receipt of specifics of future assignments, Mr. Ajibola will provide it to Pretrial Services immediately and request further modifications of his release, if necessary.

Application GRANTED. Mr. Ajibola's release conditions shall be modified to eliminate the conditions of curfew and location monitoring. Furthermore, Mr. Ajibola shall be permitted to travel to the Eastern District of Pennsylvania for the purpose of pursuing the employment opportunity described above.

The Clerk of Court is directed to terminate the pending motion at docket entry 90.

Dated: June 9, 2022
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE